



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

***\*Response Required – Deadline Enclosed\****

***Underground Injection Control Program***

***"Protecting Our Underground Sources of Drinking Water"***

23-Apr-09

OCCIDENTAL PERMIAN LTD.

ATTN: MENDY JOHNSON

P.O. BOX 1650

DENVER CITY, TX 79323

## **LETTER OF VIOLATION and SHUT-IN DIRECTIVE Failed Mechanical Integrity Test**

Dear Operator:

The following test(s) were performed on the listed dates on the following well(s) shown below in the test detail section.

The test(s) indicates that the well or wells failed to meet mechanical integrity standards of the New Mexico Oil Conservation Division. To comply with guidelines established by the U.S. Environmental Protection Agency, the well(s) must be shut-in immediately until it is successfully repaired. The test detail section which follows indicates preliminary findings and/or probable causes of the failure. This determination is based on a test of your well or facility by an inspector employed by the Oil Conservation Division. Additional testing during the repair operation may be necessary to properly identify the nature of the well failure.

Please notify the proper district office of the Division at least 48 hours prior to the date and time that the well(s) will be retested so the test may be witnessed by a field representative.

### ***MECHANICAL INTEGRITY TEST DETAIL SECTION***

#### **NORTH HOBBS G/SA UNIT No.431**

**30-025-05467-00-00**

Active Injection - (All Types)

I-23-18S-37E

Test Date: 4/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/25/2009

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: PRESSURE TESTED 3 TIMES: 1ST 570#/520# 12 MINS; 2ND TEST 570#/500# 12 MINS; 3RD TEST 580#/500# 12 MINUTES;\*\*\*OPERATOR IN VIOLATION OF NMOC RULE 703\*\*\*\*\*

#### **NORTH HOBBS G/SA UNIT No.422**

**30-025-05478-00-00**

Active Injection - (All Types)

H-24-18S-37E

Test Date: 4/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/25/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: PRESSURED UP TWICE ON WELL; WOULD NOT HOLD PRESSURE; 1ST TEST 560#/505# IN 18 MINS; 2ND TEST 560#/520# IN 7 MINS; \*\*\*\*\*OPERATOR IN VIOLATION OF NMOC RULE 703\*\*\*\*\*

**NORTH HOBBS G/SA UNIT No.112****30-025-07358-00-00**

Expired TA Injection - (All Types)

D-19-18S-38E

Test Date: 4/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/25/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WELL WOULD NOT HOLD PRESSURE; \*\*\*\*OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*\*\*

**NORTH HOBBS G/SA UNIT No.341****30-025-07500-00-00**

Active Injection - (All Types)

O-31-18S-38E

Test Date: 4/16/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/20/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WHILE TESTING WELL AFTER 8 MINUTES INTO TEST, INTERMEDIATE STRING OF CASING STARTED TO RELEASE OILY FLUID. FAILED MECHANICAL INTEGRITY \*\*\*\*OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*\*\*

**NORTH HOBBS G/SA UNIT No.321****30-025-12506-00-00**

Active Injection - (All Types)

G-32-18S-38E

Test Date: 4/17/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/21/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: \*\*\*\*WELL DID NOT HOLD PRESSURE; OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*\*.

**BYERS B No.034****30-025-24079-00-00**

Approved TA Oil (Producing)

B-4-19S-38E

Test Date: 4/15/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/19/2009

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: FAILED PRESSURE TEST ON 8/15/2007; FAILURE TO REPAIR PRIOR UIC REGULATORY TEST\*\*\*OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*

**NORTH HOBBS G/SA UNIT No.432****30-025-26974-00-00**

Active Injection - (All Types)

I-32-18S-38E

Test Date: 4/8/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/12/2009

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: \*\*\*OPERATOR HAS BEEN USING NO C103 SHOWING REPAIRS\*\*\*FAILURE TO REPAIR PRIOR VIOLATION---SIGNIFICANT NON COMPLIANCE\*\*\*\*?

**NORTH HOBBS G/SA UNIT No.422****30-025-28268-00-00**

Active Injection - (All Types)

H-33-18S-38E

Test Date: 4/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/25/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WELL WOULD NOT HOLD PRESSURE; \*\*\*\*OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*\*\*

**NORTH HOBBS G/SA UNIT No.342****30-025-29062-00-00**

Active Injection - (All Types)

O-24-18S-37E

Test Date: 4/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 7/25/2009

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: PRESSURE TESTED WELL TWICE; WOULD NOT HOLD PRESSURE; 1ST TEST 560#/505# IN 16 MINS; 2ND TEST 570#/500# IN 22 MINS; \*\*\*OPERATOR IN VIOLATION OF NMOC Rule 703\*\*\*

**NORTH HOBBS G/SA UNIT No.242****30-025-29276-00-00**

N-28-18S-38E

**Active Injection - (All Types)****Test Date:** 4/17/2009**Permitted Injection PSI:****Actual PSI:****Test Reason:** Annual IMIT**Test Result:** F**Repair Due:** 7/21/2009**Test Type:** Std. Annulus Pres. Test**FAIL TYPE:** Other Internal Failure**FAIL CAUSE:****Comments on MIT:** WOULD NOT HOLD PRESSURE (RAN TWICE); GAINED PRESSURE DURING 1ST PT; 560#/580# 10 MINS; 2ND PT 520#/580# 17 MINS; \*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 703\*\*\*\***NORTH HOBBS G/SA UNIT No.533****30-025-35541-00-00**

J-29-18S-38E

**Active Oil (Producing)****Test Date:** 4/9/2009**Permitted Injection PSI:****Actual PSI:****Test Reason:** Annual IMIT**Test Result:** F**Repair Due:** 7/13/2009**Test Type:** Bradenhead Test**FAIL TYPE:** Other Internal Failure**FAIL CAUSE:****Comments on MIT:** SURFACE CASING HAS 600# AND FLUID (POSSIBLE SALT WATER VERY FOUL SMELL); DID NOT ATTEMPT TO BLEED DOWN. \*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 703\*\*\*\*

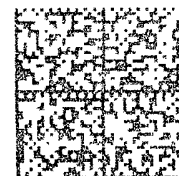
In the event that a satisfactory response is not received to this letter of direction by the "Repair Due:" date shown above, or if the well(s) are not immediately shut-in, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,

  
Hobbs OCD District Office  
**COMPLIANCE OFFICER**

Note: Pressure Tests are performed prior to initial injection, after repairs and otherwise, every 5 years; Bradenhead Tests are performed annually. Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data. "Failure Type" and "Failure Cause" and any Comments are not to be interpreted as a diagnosis of the condition of the wellbore. Additional testing should be conducted by the operator to accurately determine the nature of the actual failure. \* Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.

EMNRD  
OIL CONSERVATION DIVISION  
1625 N FRENCH DRIVE  
HOBBS NM 88240



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|--------|-------------------|------------|
| HASLER | 017H15554612      | US POSTAGE |
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|        | 04/23/2009        |            |
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DENVER CITY, TX 79323